

## A. REMARKS

The Examiner is thanked for the performance of a thorough search. No amendments have been made herein. Hence, Claims 1-4, 6-9, 16-23, 25-28 and 30-32 are pending in this application. All issues raised in the Final Office Action mailed February 28, 2003 are addressed hereinafter.

## OBJECTION TO DRAWINGS

The objection to the drawings by the Draftsperson per The Notice of Draftsperson's Patent Drawing Review is acknowledged. Formal drawings with correct margins are submitted herewith for consideration and acceptance by the Examiner.

## REJECTION OF CLAIMS 1-4, 6-9, 16-23, 25-28 AND 30-32 UNDER 35 U.S.C. § 103(a)

Claims 1-4, 6-9, 16-23, 25-28 and 30-32 were rejected under 35 U.S.C. § 103(a) as being unpatentable over *Zuili et al.*, U.S. Patent No. 6,145,084 (hereinafter "*Zuili*"). It is respectfully submitted that Claims 1-4, 6-9, 16-23, 25-28 and 30-32 are patentable over *Zuili* for at least the reasons provided hereinafter.

## CLAIM 1

Claim 1 recites a method for processing data on a distributed computing system that includes a plurality of nodes that requires the steps of:

“maintaining mapping data that specifies work that can be performed by each of the plurality of nodes;  
in response to receiving a first work request to perform first work from a first process on a first node from the plurality of nodes, determining based upon the first work and the mapping data, that the first work is to be performed on a second node from the plurality of nodes;

providing the first work request to a second process on the second node, wherein the first work request specifies that the first process is to directly receive results of the first work;  
determining based upon the first work and the mapping data, that the first work is also to be performed on a third node from the plurality of nodes, and  
providing a second work request to a third process on the third node, wherein the second work request specifies that results of the first work performed on the third node are to be provided directly to the first process.”

It is respectfully submitted that Claim 1 includes at least several limitations that are not taught or suggested by *Zuili*. For example, Claim 1 requires “maintaining mapping data that specifies work that can be performed by each of the plurality of nodes.” The Office Action asserts that the protocol conversion and language translation data maintained by verifying server 12, as described in *Zuili* at Col. 4, line 43 through Col. 5, line 2, is the “mapping data” recited in Claim 1. The text at this portion of *Zuili* describes that verifying server 12 maintains “information as to the capability level of the sending and/or receiving devices, along with application programs necessary to translate the signals that may be sent by that device to an alternate form which may be required for the receiving device.” For example, the data maintained by verifying server 12 may specify whether devices A and B can communicate with each other and how to translate signals exchanged between devices A and B. There is no mention or suggestion of the work that can be performed by devices A and B. Thus, verifying server 12 does not maintain “mapping data” as defined by Claim 1.

Claim 1 also requires that the first work be performed on both the second and third nodes. The Office Action asserts that the “first node” recited in Claim 1 is device A of FIG. 1, the “second node” recited in Claim 1 is verifying server 12 and that the “third node” recited in Claim 1 is device B. The Office Action also asserts that the “first work

request” recited in Claim 1 is the request-to-send (RTS) that device A sends to verifying server 12 when device A desires to communicate with device B. The Office Action further asserts that the “first work” recited in Claim 1 is the verification process performed by verifying server 12.

Given these assertions, the requirements in Claim 1 that the first work be performed on both the second and third nodes is not in any way taught or suggested by *Zuili* since device B does not perform any of the verification processes performed by verifying server 12. Thus, the “first work” of *Zuili*, i.e., the verification process performed by verifying server 12, is performed only on the “second node,” i.e., verifying server 12, and not on the “third node,” i.e., device B. Accordingly, the limitations in Claim 1 that the first work be performed on both the second and third nodes is not taught or suggested by *Zuili*.

In view of the foregoing, it is respectfully submitted that Claim 1 contains several limitations that are not taught or suggested by *Zuili* and is therefore patentable over *Zuili*.

#### CLAIMS 2-4 AND 6-9

Claims 2-4 and 6-9 depend from Claim 1 and include all of the limitations of Claim 1. It is therefore respectfully submitted that Claims 2-4 and 6-9 are patentable over *Zuili* for at least the reasons set forth herein with respect to Claim 1. Furthermore, it is respectfully submitted that Claims 2-4 and 6-9 recite additional limitations that independently render them patentable over *Zuili*.

#### CLAIMS 16-19

Claims 16-19 include limitations similar to Claims 1-4 and 6-9, except in the context of a distributed computing system. It is therefore respectfully submitted that Claims 16-19 are patentable over *Zuili* for at least the reasons set forth herein with respect to Claims 1-4 and 6-9.

#### CLAIMS 20-23 AND 25-28

Claims 20-23 and 25-28 include limitations similar to Claims 1-4 and 6-9, except in the context of a computer-readable medium. It is therefore respectfully submitted that Claims 20-23 and 25-28 are patentable over *Zuili* for at least the reasons set forth herein with respect to Claims 1-4 and 6-9.

#### CLAIMS 30-32

It is respectfully submitted that Claim 30 includes at least several limitations that are not in any way taught or suggested by *Zuili*. For example, Claim 30 requires the step of “maintaining mapping data that specifies work that can be performed by each of the plurality of nodes” which is also required by Claim 1. This limitation is not taught or suggested by *Zuili* as described herein with respect to Claim 1.

Claim 30 also requires “in response to receiving a first work request to perform first work from a first process on a first node from the plurality of nodes, determining based upon the first work and the mapping data, that the first work is to be performed on a second node from the plurality of nodes, generating an updated first work request that specifies that the first process is to directly receive results of performing the first work, and providing the updated first work request to a second process on the second node.”

Given the assertions in the Office Action as to the elements in *Zuili* that constitute the “first node,” “second node” and “first work.” Given these assertions, verifying server 12 would have to, in response to receiving an RTS from device A, determine, based upon the protocol conversion and language translation functions, that verifying server 12 is to perform a verification function and then generate and provide to itself an updated request to perform the verification function. *Zuili* describes that in response to receiving an RTS from device A, verifying server 12 generates and provides an authorization signal back to device A. There is no mention or suggestion in *Zuili* that verifying server 12 generates an updated first work request and provides the updated first work request to itself.

Based on the foregoing, it is respectfully submitted that Claim 30 includes at least several limitations that are not in any way taught or suggested by *Zuili* and is therefore patentable over *Zuili*.

Claims 31 and 32 recite limitations similar to Claim 30, except in the context of an apparatus and computer-readable medium, respectively.

In view of the foregoing, reconsideration and withdrawal of the rejection of Claims 1-4, 6-9, 16-23, 25-28 and 30-32 under 35 U.S.C. § 103(a) as being unpatentable over *Zuili* is respectfully requested.

REJECTION OF CLAIMS 1-4, 6-9, 16-23, 25-28 AND 30-32 UNDER 35 U.S.C. §  
102(e)

Claims 1-4, 6-9, 16-23, 25-28 and 30-32 were rejected under 35 U.S.C. § 102(e) as being anticipated by *Chessell*, U.S. Patent No. 6,324,589. It is respectfully submitted that Claims 1-4, 6-9, 16-23, 25-28 and 30-32 are not anticipated by *Chessell* for at least the reasons provided hereinafter.

## CLAIM 1

Claim 1 recites a method for processing data on a distributed computing system that includes a plurality of nodes that requires the steps of:

“maintaining mapping data that specifies work that can be performed by each of the plurality of nodes;  
in response to receiving a first work request to perform first work from a first process on a first node from the plurality of nodes, determining based upon the first work and the mapping data, that the first work is to be performed on a second node from the plurality of nodes;  
providing the first work request to a second process on the second node, wherein the first work request specifies that the first process is to directly receive results of the first work;  
determining based upon the first work and the mapping data, that the first work is also to be performed on a third node from the plurality of nodes, and  
providing a second work request to a third process on the third node, wherein the second work request specifies that results of the first work performed on the third node are to be provided directly to the first process.”

It is respectfully submitted that Claim 1 includes several limitations that are not in any way taught or suggested by *Chessell*. For example, the steps of “maintaining mapping data that specifies work that can be performed by each of the plurality of nodes” and “in response to receiving a first work request to perform first work from a first process on a first node from the plurality of nodes, determining based upon the first work and the mapping data, that the first work is to be performed on a second node from the plurality of nodes” are not in any way taught or suggested by *Chessell*. In *Chessell*, assuming that the data update logic process 33 is a node on which work can be performed, no mapping data is maintained that specifies work that can be performed by data update logic process 33. Furthermore, in *Chessell*, no determination is made that a particular node from a plurality of nodes is to perform the requested work based upon the work request and mapping data. In *Chessell*, the work is always performed by the data update logic process 33.

Claim 1 also requires that “the first work request specifies that the first process is to directly receive results of the first work.” In *Chessell*, user interface process 31 does not receive results of work performed by data update logic process 33. The only data received by user interface process 31 from data update logic process 33 is a registration request so that data update logic process 33 can participate in two-phase commit transactions.

Claim 1 also requires that a determination is made “that the first work is also to be performed on a third node from the plurality of nodes.” Thus, the first work is performed on both the second and third nodes. *Chessell* does not in any way teach or suggest this limitation. In *Chessell*, work is only performed on data update logic process 33.

Based on the foregoing, it is respectfully submitted that Claim 1 includes at least several limitations that are not in any way taught or suggested by *Chessell* and is therefore patentable over *Chessell*.

#### CLAIMS 2-4 AND 6-9

Claims 2-4 and 6-9 depend from Claim 1 and include all of the limitations of Claim 1. It is therefore respectfully submitted that Claims 2-4 and 6-9 are not anticipated by *Chessell* for at least the reasons set forth herein with respect to Claim 1. Furthermore, it is respectfully submitted that Claims 2-4 and 6-9 recite additional limitations that independently render them patentable over *Chessell*.

## CLAIMS 16-19

Claims 16-19 include limitations similar to Claims 1-4 and 6-9, except in the context of a distributed computing system. It is therefore respectfully submitted that Claims 16-19 are not anticipated by *Chessell* for at least the reasons set forth herein with respect to Claims 1-4 and 6-9.

## CLAIMS 20-23 AND 25-28

Claims 20-23 and 25-28 include limitations similar to Claims 1-4 and 6-9, except in the context of a computer-readable medium. It is therefore respectfully submitted that Claims 20-23 and 25-28 are not anticipated by *Chessell* for at least the reasons set forth herein with respect to Claims 1-4 and 6-9.

## CLAIMS 30-32

It is respectfully submitted that Claim 30 includes at least several limitations that are not in any way taught or suggested by *Chessell*. For example, the steps of “maintaining mapping data that specifies work that can be performed by each of the plurality of nodes” and “in response to receiving a first work request to perform first work from a first process on a first node from the plurality of nodes, determining based upon the first work and the mapping data, that the first work is to be performed on a second node from the plurality of nodes” are not in any way taught or suggested by *Chessell*. In *Chessell*, assuming that the data update logic process 33 is a node on which work can be performed, no mapping data is maintained that specifies work that can be performed by data update logic process 33. Furthermore, in *Chessell*, no determination is made that a particular node from a plurality of nodes is to perform the requested work



based upon the work request and mapping data. In *Chessell*, the work is always performed by the data update logic process 33.

As another example, Claim 30 also requires “generating an updated first work request that specifies that the first process is to directly receive results of performing the first work” and “providing the updated first work request to a second process on the second node.” These limitations are not in any way taught or suggested by *Chessell*. In *Chessell*, the transaction context is provided by business logic process 32 to data update logic process 33 without modification.

Based on the foregoing, it is respectfully submitted that Claim 30 includes at least several limitations that are not in any way taught or suggested by *Chessell* and is therefore patentable over *Chessell*.

Claims 31 and 32 recite limitations similar to Claim 30, except in the context of an apparatus and computer-readable medium, respectively.

In view of the foregoing, reconsideration and withdrawal of the rejection of Claims 1-4, 6-9, 16-23, 25-28 and 30-32 under 35 U.S.C. § 102(e) as being anticipated by *Chessell* is respectfully requested.

It is respectfully submitted that all of the pending claims are in condition for allowance and the issuance of a notice of allowance is respectfully requested. If there are any additional charges, please charge them to Deposit Account No. 50-1302.

The Examiner is invited to contact the undersigned by telephone if the Examiner believes that such contact would be helpful in furthering the prosecution of this application.

Respectfully submitted,  
HICKMAN PALERMO TRUONG & BECKER LLP



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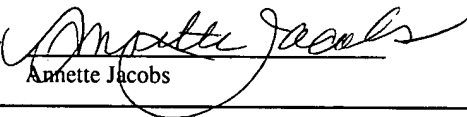
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on April 18, 2003

by

  
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